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August 25, 2023

**VIA ECF**

Honorable Jennifer H. Rearden  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 1010  
New York, NY 10007

**USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 8/28/2023**

**Re: Steven Rosati v. Long Island Rail Road Co., et al., No. 21-CV-08594**

Dear Judge Rearden,

We represent Defendants Metropolitan Transportation Authority, Long Island Rail Road Company, and Patrick J. Foye in the above-captioned action. We write to Your Honor respectfully requesting an adjournment of the conference currently scheduled for **August 30, 2023 at 10:30 a.m.** to address Defendants' application for a protective order. *See* ECF No. 73. This is our first request for an adjournment of this conference.

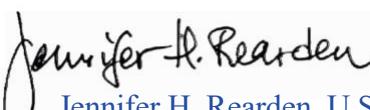
I will be out of the county on a family vacation next week, returning on September 5, 2023. Plaintiff's counsel has consented via email to our request for an extension. I have conferred with Edward Paltzig, counsel for the Plaintiff, and both parties are generally available to reschedule the conference on September 5, 6, or 7, 2023, at Your Honor's convenience. Please be advised that the close of fact discovery is September 8, 2023.

Application GRANTED. The conference previously scheduled for August 30, 2023 at 10:30 a.m. is hereby adjourned to September 6, 2023 at 11:30 a.m.

Respectfully submitted,

  
Helene R. Hechtkopf

SO ORDERED.

  
Jennifer H. Rearden, U.S.D.J.  
Date: Aug. 28, 2023